

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

JAN 14 2019

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY DEPUTY

IN THE MATTER OF THE  
SEARCH OF:

Nine (9) United States Mail Parcels

Case No. \_\_\_\_\_

18 - 3577 ADC

**AFFIDAVIT IN SUPPORT OF APPLICATION  
FOR A SEARCH WARRANT FOR UNITED STATES MAIL PARCELS**

Your Affiant, Douglas Henegar, United States Postal Inspector, Baltimore, MD, being duly sworn, hereby deposes and states as follows:

**I. Subject Parcels.**

1. This is an Affidavit submitted in support of an Application for a Search Warrant for nine (9) subject United States ("U.S.") Mail Parcels (hereinafter "Subject Parcels" collectively or "Subject Parcel" individually). The Subject Parcels are currently located at the Incoming Mail Facility, in Linthicum Heights, Maryland. The Subject Parcels are specifically identified as follows:

<i><b>Subject Parcel</b></i>	<i><b>Express (E) or Priority (P) and Tracking ID number</b></i>	<i><b>From: Name and Address</b></i>	<i><b>To: Name and Address</b></i>
1.	(E) EE337164204US	Delfina Witred 25175 Charlinda Trl. Mission Viejo, CA 92691	Joey Papillero 12811 Ethel Rose Way Boysts, MD 20841
2.	(E) EL398635539US	Damtew Woldehana 85 Fulton St. #1 Campbell, CA 95008	Gulilat Tadesse 2316 Kansas Ave Silver Spring, MD 20910
3.	(E) EE265273511US	Chay Tran 10503 Odessa Dr. Sugar Land, TX 77498	Lieu Anh Dung 9165 Hitching Post Ln. E Laurel, MD 20723

4.	(E) EE261542822US	DJ Brobby 1762 West Blvd. Los Angeles, CA 90019	Paula Danquam Brobby 1401 Caddington Ave. Silver Spring, MD 20901
5.	(E) EL435276639US	Eric Bonner 12501 1 <sup>st</sup> Ave Seattle, WA 98134	Jimmy Rogers 3617 W Garrison Ave. Baltimore, MD 21215
6.	(E) EE379598250US	Emma Grates 949 N. Oak Ukiah, CA 95482	Melanie Ward Unit C-52 4615 Crain Hwy White Plains, MD 20695
7.	(E) EM091527735US	Dynamic Beauty Bar 1117 W Rosamond Blvd Rosamond, CA 93560	Kimberly Alba 1121 Cavendish Dr. Silver Spring, MD 20905
8.	(P) 9505514509178334154650	S.S. 4913 Addison Rd. Capitol Heights, MD 20743	ASH 2700 Reisterstown Rd. Baltimore, MD 21215
9.	(P) 9505510555478358249381	Carmen Gonzalez RR3 Box 11362 Anasco, PR 00610	Fredy Pesante 9610 Mason Ln. Laurel, MD 20723

## II. Affiant's Training and Experience

2. Your Affiant has been a United States Postal Inspector since April 2012 and has completed 12 weeks of basic investigative training, which included the investigation of narcotics related offenses. Your Affiant routinely investigates the use of the U.S. Mail to ship narcotics and narcotics proceeds to and from the Baltimore/Washington area from the known narcotic source areas of Florida, Georgia, California, Arizona, Texas and Colorado (among others). As a result of your Affiant's training and experience, your Affiant is aware that Express Mail and Priority Mail services are regularly used by narcotics traffickers to ship controlled substances and bulk cash through the U.S. Mail.

3. Based upon my training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics, controlled substances or the proceeds thereof (*i.e.* U.S. currency). These factors, more fully detailed below, are used to identify packages requiring further investigation. In the case of this search warrant, several of these factors were identified, and the package was alerted to by the drug detection canine. The most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

a. *Contrasts observed between legitimate business parcels and drug parcels:* As an alternative to First Class Mail (which does not provide a customer with the capability to track the progress of a parcel through the system), the U.S. Postal Service offers Priority Mail Express and Priority Mail. Priority Mail Express is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt for a signature requirement at the other end or not. Customers can track the parcel on line by its distinct Priority Mail Express tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Priority Mail Express costs more than Priority Mail. Priority Mail has a delivery service standard of 1-3 business days, but delivery within that time period is not guaranteed. Priority Mail is a less expensive alternative to Priority Mail Express, but still provides the ability to track a parcel. Legitimate businesses using Priority Mail Express typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing. In contrast, the drug distributor will pay for the cost of mailing the package at the counter by using cash or a credit card. Business Priority Mail Express parcels typically weigh no more

than 8 ounces, and business Priority Mail parcels typically weigh no more than 2 pounds. Drug packages typically exceed these weights. Address labels on business parcels are typically typed, whereas those on drug packages are typically hand written. In your affiant's experience, it is fairly easy to separate out smaller parcels, which constitute 70% to 80% of all Priority Mail Express and Priority Mail parcels, from other, heavier parcels. Typically, drug traffickers use Priority Mail Express, and will opt out of the requirement of obtaining a signature upon delivery.

b. *Invalid Sender/Return Address:* When drugs are shipped through the mail, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. Your affiant has seen packages sent by persons with names of celebrities, cartoon characters, or fictional names. More often a search of a law enforcement database reflects that there is no association between the name of the sender and the address provided.

c. *Invalid Recipient/Address:* It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not actually associated with the receiving address. This allows the person receiving the package to claim that they did not know about its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

d. *Location of Sender:* The fact that a package was sent from narcotics source states such as Arizona, California, Texas, Washington, Colorado, Puerto Rico and Florida (among others) can also indicate that the parcel contains controlled substances.

e. *Smell:* The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. Other smells that suggest that a parcel may contain narcotics include the aroma of masking agents. Common masking agents used in an attempt to thwart detection by law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

f. *Heavy Taping:* Heavily taped parcels are another factor that will suggest a drug parcel, because narcotics parcels are heavily taped in an effort to keep the smell inside and to forestall easy checking on the interior contents by lifting up a flap. For this reason, your affiant has also observed excessive glue on the flaps of narcotics parcels as well.

g. *Click-N-Ship:* The U.S. Postal Service created Click-N-Ship as a service for frequent mailers and businesses who prefer printing address labels and purchasing postage from their residence or business. Drug traffickers create Click-N-Ship accounts as a means of giving a legitimate appearance to their drug mailings. They create the accounts using fictitious account information and often provide pre-paid credit cards as a means of payment, which are difficult to track. Drug traffickers often use legitimate business return addresses in states other than California and Arizona as a means to deter detection, as these other states are not usually considered “source” states for controlled substances. The postage labels are printed/typed, unlike the typical drug related mailing label which is handwritten.

4. It is your affiant’s experience that when these factors are observed, a drug detection K-9 will likely “alert,” next to the parcel, indicating that the dog has detected the presence of narcotics. As a result, these factors become a reliable way to profile the parcels being shipped

every day.

5. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

### III. Probable Cause

6. The following factors or suspicious characteristics are present in each of the Subject Parcels:

<i>Subject Parcel Express or Priority</i>	<i>From Source State:</i>	<i>Weight:</i>	<i>Label:</i>	<i>Senders name associated with address? Yes / No</i>	<i>Recipients name associated with address? Yes / No</i>	<i>Canine Alert?</i>
1.Express	Yes - CA	2 lbs 14 ozs	Handwritten	No	Yes	Yes – Kayden
2.Express	Yes - CA	2 lbs 9 ozs	Handwritten	Yes	No	Yes – Kayden
3.Express	Yes - TX	31 lbs 7 ozs	Handwritten	No	Yes	Yes – Kayden
4.Express	Yes - CA	3 lbs 15 ozs	Handwritten	No	Yes	Yes – Kayden
5.Express	Yes - WA	1 lbs 7 ozs	Handwritten	No	No	Yes – Kayden
6.Express	Yes - CA	8 lbs 12 ozs	Handwritten	No	No	Yes – Kayden
7.Express	Yes - CA	4 lbs 1 ozs	Handwritten	No	No	Yes – Kayden
8.Priority	Yes - MD	0 lbs 12 ozs	Handwritten	No	No	Yes – Kayden
9.Priority	Yes - PR	10 lbs 3 ozs	Handwritten	No	Yes	Yes – Kayden

7. The suspicious characteristics listed above were identified while the Subject Parcels

were in the mail stream. Therefore, each Subject Parcel was individually removed from the mail stream. At that point, law enforcement used standard protocol for canine detection to determine whether there was probable cause that each Subject Parcel contained narcotics. Specifically, on December 27, 2108, after being removed from the mail stream, the Subject Parcels were placed individually in a secure area next to several other empty and unused boxes at the U.S. Postal Service Incoming Mail Facility, located in Linthicum, MD. At that time, a narcotic detecting canine named "Kayden" was brought forward to scan the group of boxes, which included a Subject Parcel and the empty and unused boxes placed around the Subject Parcel. The handler observed the canine and then informed agents whether the dog alerted on the Subject Parcel. The canine handler for "Kayden" is Montgomery County Police Detective Jeffery Ward. "Kayden" was last certified in April 2018 and is trained on the odor of cocaine, heroin, black tar heroin, marijuana, and MDMA. Additionally, "Kayden" receives monthly recurrent narcotics odor detecting training to ensure his accuracy.

8. This process was repeated for each Subject Parcel. As indicated in the chart, the drug detection dog alerted to the presence of narcotics in each Subject Parcel.

## **VI. Conclusion**

9. Based upon the above indicators reflected in the Subject Parcels, my training and experience, and the alert of a trained canine on each Subject Parcel, your Affiant believes that there

is probable cause that the Subject Parcels contain narcotics or controlled substances, or the proceeds thereof (*i.e.* U.S. currency), and/or materials relating to the distribution of controlled substances through the United States Mail.



Douglas Henegar  
United States Postal Inspector

Subscribed and sworn to before me this 28<sup>th</sup> day of December, 2018.



A. David Copperthite  
United States Magistrate Judge